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March 15, 2018

VIA ECF

Hon. Judge Claire R. Kelly
U.S. Court of International Trade
One Federal Plaza
New York, New York 10278-0001

Re: Claude Lewis v. American Sugar Refining, Inc., et. al.
Civil Action No.: 14-cv-02302

Dear Your Honor:

Please be advised, the undersigned is counsel to Plaintiff Claude Lewis (“Plaintiff”) in the above-captioned matter. I write in response to Your Honor’s March 12, 2018 Correspondence requesting clarification of certain exhibits included on the parties Proposed Joint Pretrial Order.

With respect to PX-7, unfortunately, the undersigned was unable to locate a more legible copy of the original document and Plaintiff continues to try and locate a more legible original copy of the document.

With respect to PX-22 and PX-5, after another review, the undersigned notes that the court is correct that the exhibits are duplicates. The undersigned apologizes for this oversight and notes that two copies of the same document are not needed as separate exhibits. Plaintiff shall remove PX-22 as an exhibit and is happy to, with the Court’s and Defendants’ counsel’s consent, file an amended JPTO to reflect same.

With respect to JX-6 and DX-5, after another review, the undersigned notes that the exhibits are duplicates of each other. The undersigned again apologizes to the court for this oversight and Plaintiff wishes to remove JX-6 as a stipulated exhibit. Plaintiff reiterates his objections to DX-5 – the substance of the exhibit, dated 1990, has little, if any, relevance to



ATTORNEYS AT LAW

Plaintiff's claims to be decided by the jury and Defendants have not made any sufficient proffer as to the relevance of this document, which is nearly three decades old.

Counsel remains available should Your Honor have any questions or concerns. Thank you.

Respectfully submitted,
NESENOFF & MILTENBERG LLP

By: /s/ Megan Goddard
Megan Goddard, Esq.

CC: All counsel (VIA ECF)